

**To:** DeYoung, Robyn[DeYoung.Robyn@epa.gov]  
**Cc:** Jeremy Fisher[jfisher@synapse-energy.com]; Patrick Luckow[PLuckow@synapse-energy.com]; Sarah Jackson[sjackson@synapse-energy.com]  
**From:** Mulholland, Denise  
**Sent:** Fri 6/19/2015 4:47:27 PM  
**Subject:** Re: State demonstration TSD checklist, sorted template

I think this is really helpful and you make good points, Jeremy. One of my first reactions after I read the text in the preamble was "as a state, as this is now written, I am not at all sure exact what I need to report to EPA."

This effort will help us to streamline it the preamble and draft the TSD in a helpful way.

Thanks,  
Denise

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Denise Mulholland  
U.S. Environmental Protection Agency  
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Sent from my iPhone - please excuse any typos

On Jun 19, 2015, at 11:53 AM, DeYoung, Robyn <DeYoung.Robyn@epa.gov> wrote:

This is great. Look at it now.. may call you around 1pm

**From:** Jeremy Fisher [mailto:jfisher@synapse-energy.com]  
**Sent:** Friday, June 19, 2015 10:54 AM  
**To:** DeYoung, Robyn; Mulholland, Denise  
**Cc:** Patrick Luckow; Sarah Jackson  
**Subject:** State demonstration TSD checklist, sorted template

Robyn and Denise,

I wanted to give a closer eye to the checklist, and firm up the question marks. There are three new tabs in the attached checklist.

Cheatsheet: a verified full list, with duplicates as shown on pages of the preamble. Marked w/ rate/mass and ES/SM, also marked for "used in performance demonstration" and "model input/output/either"

Cheatsheet-sorted: Suggested sort for clarity

Cheatsheet-short: consolidated common factors across rate/mass ES/SM. There are still a lot of inconsistencies in the preamble itself.

In general:

- [REDACTED] Red markings are unknowns by me. Not clear if a statement is meant to apply to rate or mass specifically, or the actual phrase in the preamble is super ambiguous and could really use some clarity.

- [REDACTED] “Projected CO2 Performance Demonstration” is if a factor is key as part of the actual analysis that gets performed. Not just something that needs to be in the plan somewhere, but actually used in analysis.

- [REDACTED] “Demonstration Input/Output” is a general guide on if the metrics are an input or an output of modeling, or either. Depending on the type of model used, a whole bunch of these factors could be legitimately considered outputs, and inevitably even inputs of some form are outputs of a different model somewhere else. So its sort of a tricky question. Also, some things like retirements or fuel switching could be the output of an economic model, or an input from utility or stakeholder perspectives. Also ambiguous. So I’m stating “either” for some of those.

Next steps:

- [REDACTED] I think that there are a number of places where inconsistencies need to be ironed out. Happy to help.

- [REDACTED] Maybe this table should be sorted into recommended steps associated with the actual TSD and marked as “required under preamble”, or “recommended in TSD.” Because the preamble doesn’t cover everything that you’d want (and sometimes maybe too much), but alone the cheatsheet doesn’t quite get the whole story across right now.

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